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March 16, 2021

VIA ECF

Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

**APPLICATION GRANTED
SO ORDERED** 
VERNON S. BRODERICK
U.S.D.J. 3/18/2021

Re: United States v. Heidi Hong Piao, 15-cr-706

Dear Judge Broderick:

This office represents Defendant Heidi Hong Piao in the above-captioned matter.

We respectfully request that this Court enter an order granting: (1) the release and return of Ms. Piao's passport, and (2) the release of 50% (\$51,500) of the remaining \$103,000 cash bond.¹ The Government (via Assistant U.S. Attorney Daniel Richenthal) and Pretrial Services (via Officer Francesca Tessier-Miller) do not object to either request.

On March 5, 2021, this Court sentenced Ms. Piao to time served plus a term of supervised release. Prior to sentencing, Ms. Piao spent more than five years under strict supervision pursuant to her pre-trial bail conditions. During that time, Ms. Piao abided by every bail condition without incident.

Ms. Piao agrees that she will not travel internationally for the duration of her supervised release term without prior authorization from this Court. Further, Ms. Piao has agreed that the other 50% (\$51,500) of the remaining cash bond will continue to be held while she endeavors to resolve her civil penalty with the IRS.

¹ The entirety of the cash bond was posted by Ms. Piao's sister Grace Piao.

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Respectfully submitted,

/s/ Jamie Gottlieb Furia

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cc: Daniel Richenthal, Assistant U.S. Attorney (via ECF)
Francesca Tessier-Miller, U.S. Pretrial Services Officer (via Email)